



COMMONWEALTH of VIRGINIA

Department of Health

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February 27, 2023

MEMORANDUM

To: Virginia Waterworks Owners

From: Dwayne Roadcap, Director
Office of Drinking Water (ODW)

A handwritten signature in black ink, reading "Dwayne Roadcap".

Thank you for your continued efforts to provide Virginians with a safe, trusted, reliable, and affordable drinking water supply. Managing a public water system is difficult work and our team appreciates your hard work in all aspects of service delivery, including satisfying administrative and reporting requirements. As a waterworks owner, you have many responsibilities and priorities. I want to highlight one specific responsibility and priority for your awareness as the drinking water program makes an important change in our business process; specifically, correcting errors found in sampling reports submitted to ODW.

In 2021, ODW required waterworks through their laboratories to submit sampling results through the Compliance Monitoring Data Portal (CMDP). This efficiency vastly improved collection of about 110,000 water sampling results each year, but challenges remain. ODW staff continues to observe routine reporting errors in CMDP. Reporting errors include typographical errors and incorrect information such as incorrect water system, wrong facility or sampling point, incorrect sample type, wrong analyte, and incorrect analytical method. ODW staff has tried to correct errors in the database, but this effort has become too burdensome to continue.

Please understand that you, as a waterworks owner, are ultimately responsible for the collection and submission of all physical, chemical, bacteriological, and radiological analyses for the purpose of demonstrating compliance with primary and secondary maximum contaminant levels or action levels. A sample is collected when ODW receives the result in CMDP without error. The Waterworks Regulations, at 12VAC5-590-530.A requires waterworks owners to submit all sample results through CMDP by the 10th day of the month following the monitoring period.

ODW will begin issuing violations in accordance with 12VAC5-590-530 when required samples are not submitted through CMDP on time and without error. We are sharing this information with you so that you can take any steps necessary to ensure that the laboratory

reporting your sampling results submits those results, error-free, through CMDP. Your follow-up and help will make sure that you do not receive a notice of alleged violation for not submitting data properly and on-time.

ODW staff will reject sample results with obvious errors and notify the laboratory to correct and resubmit the results. Please recognize that rejected sample results do not meet the requirement for timely reporting and errors will likely not be identified by the deadlines in 12VAC5-590-530. ODW recommends that you take the following actions:

- Ensure your lab is using CMDP and is properly trained with it.
- Remind your laboratory and sampling staff of the requirements for timely reporting through CMDP, including the regulatory deadlines that waterworks are responsible for meeting.
- Communicate with your laboratory to determine the sample analysis turnaround time, from receipt of sample to reporting via CMDP.
- Modify sampling timelines as necessary to allow adequate time for laboratory analysis and reporting.
- Take steps to reduce errors in facility ID, sample point ID, and PWSID data, such as preparing pre-printed chain of custody documents and comparing that information against requirements in Drinking Water Viewer.
- Monitor the timeliness of laboratory reporting through Drinking Water Viewer.

Please understand there is no discretion in the *Waterworks Regulations* or the *Safe Drinking Water Act* to allow late reporting. Any report submitted after the 10th day of the month following the monitoring period is a violation. Late reporting requires public notification.

I hope this information proves helpful. Our team remains ready to help with training or other needs with CMDP. Feel free to contact Aaron Moses, Supervisor for our Data Management team, at Aaron.Moses@vdh.virginia.gov or (540) 520-6507 if you have additional questions or concerns. You can contact me at Dwayne.Roadcap@vdh.virginia.gov or (804) 338-0371. Thank you again for all you do every day to give Virginians and our customers confidence in their drinking water.